

# **EXHIBIT A**



Office of the City Attorney

James R. Rowader, Jr.

City Attorney

350 S. Fifth St., Room 210

Minneapolis, MN 55415

TEL 612.673.3000 TTY 612.673.2157

[www.minneapolismn.gov](http://www.minneapolismn.gov)

612.673.3919

[kristin.sarff@minneapolismn.gov](mailto:kristin.sarff@minneapolismn.gov)

February 9, 2022

By Hand Delivery

Robert Bennett

Kathryn H. Bennett

Marc E. Betinsky

Andrew J. Noel

Esther Mignanelli

Robins Kaplan LLP

800 LaSalle Avenue, Suite 2800

Minneapolis, MN 55402

Re: *Soren Stevenson v. John Doe 1, et al.*, Court File No. 20-CV-2007 (SRN/TNL)

Counsel,

Enclosed and served upon you please find the Rule 68 Offer of Judgment from Defendants Benjamin Bauer, Matthew Severance and Ryan McCann to Plaintiff Soren Stevenson.

Sincerely,

*/s Kristin R. Sarff*

Kristin R. Sarff

Assistant City Attorney

Enc.

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Soren Stevenson,

Case No. 20-CV-2007 (SRN/TNL)

Plaintiff,

v.

**RULE 68 OFFER OF JUDGMENT**

Benjamin M. Bauer, acting in his individual capacity as a Minneapolis Police Officer; Matthew Severance and Ryan McCann, acting in their individual capacities as supervisory Minneapolis Police Officers; Medaria Arradondo, acting in his official capacity as the Minneapolis Chief of Police; and the City of Minneapolis,

Defendants.

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TO: Plaintiff and his attorneys, Robert Bennett, Kathryn Bennett, Marc Betinsky, Andrew Noel, and Esther Mignanelli, Robins Kaplan, LLP, 800 LaSalle Avenue, Suite 2800, Minneapolis, MN 55402

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants Benjamin Bauer, Matthew Severance, and Ryan McCann hereby offer to allow Plaintiff Soren Stevenson to take judgment against them, jointly and severally, on all claims made or which could have been made in Plaintiff's Complaint, Amended Complaint, or Second Amended Complaint in the total amount of \$2.4 million (\$2,400,000.00) plus reasonable attorneys' fees and costs incurred by Plaintiff prior to the date of this offer; that is, with the costs then accrued. The attorneys' fees and costs will be in an amount to be set by the Court.

Acceptance of this offer of judgment against Defendants Benjamin Bauer, Matthew Severance, and Ryan McCann will be full satisfaction of all federal and state law claims or rights that Plaintiff may have to damages, or any other form of relief, and extinguish any claim or claims by Plaintiff against all named Defendants, including the City of Minneapolis and Medaria Arradondo, and their agents and employees that were brought or could have been brought in Plaintiff's Complaint, Amended Complaint, or Second Amended Complaint. By accepting this offer of judgment, Plaintiff agrees that the existing claims against all named Defendants, including the City of Minneapolis and Medaria Arradondo, in his official capacity, will be dismissed with prejudice.

This offer of judgment is not to be construed as an admission that any of the Defendants or their agents and employees are liable in this action or that Plaintiff has suffered any damages. Defendants expressly deny the validity of Plaintiff's claims and expressly deny any liability. This offer is contingent on acceptance by Plaintiff in accordance with Rule 68 of the Federal Rules of Civil Procedure.

Dated: February 9, 2022

JAMES R. ROWADER, JR.

City Attorney

By /s/ Kristin Sarff

KRISTIN R. SARFF (0388003)

SHARDA ENSLIN (0389370)

HEATHER P. ROBERTSON (0390470)

Assistant City Attorneys

350 South Fifth Street, Room 210

Minneapolis, MN 55415

(612) 673-3919

(612) 673-2180

(612) 673-3949

kristin.sarff@minneapolismn.gov

sharda.enslin@minneapolismn.gov

heather.robertson@minneapolismn.gov

*Attorneys for Defendants Benjamin Bauer,  
Ryan McCann, Matthew Severance,  
City of Minneapolis and Medaria Arradondo,  
in his official capacity*